

From: Kristy Spruell
To: David Winfrey - Legal
Sent: 11/13/2013 11:33:21 PM
Subject: SOMP - Focus Area deck
Attachments: Spotlight Deck.pptx

David,

I am presenting the Suspicious Order Monitoring Program tomorrow during the HW Compliance Focus Area meeting. The presentation is what they call a spotlight and its the way they formally introduce a new project to the group and incorporate the project into the regular reporting cadence. Ive attached the presentation deck here for your review. None of the information in the deck is really new; all of the deliverables were discussed in the original strategy deck weve been discussing for the past several weeks. Karen D has a copy of this deck, and the larger Focus Area deck, and she will be present during the discussion tomorrow.

We will also discuss the deck during our logistics leadership update meeting tomorrow afternoon.

Thanks,

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PLAINTIFFS TRIAL
EXHIBIT

P-14223_00001

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Controlled Substance Risk Assessment

Security
Cameras -
CCTV

Refusal to
Fill

Suspicious
Order
Monitoring

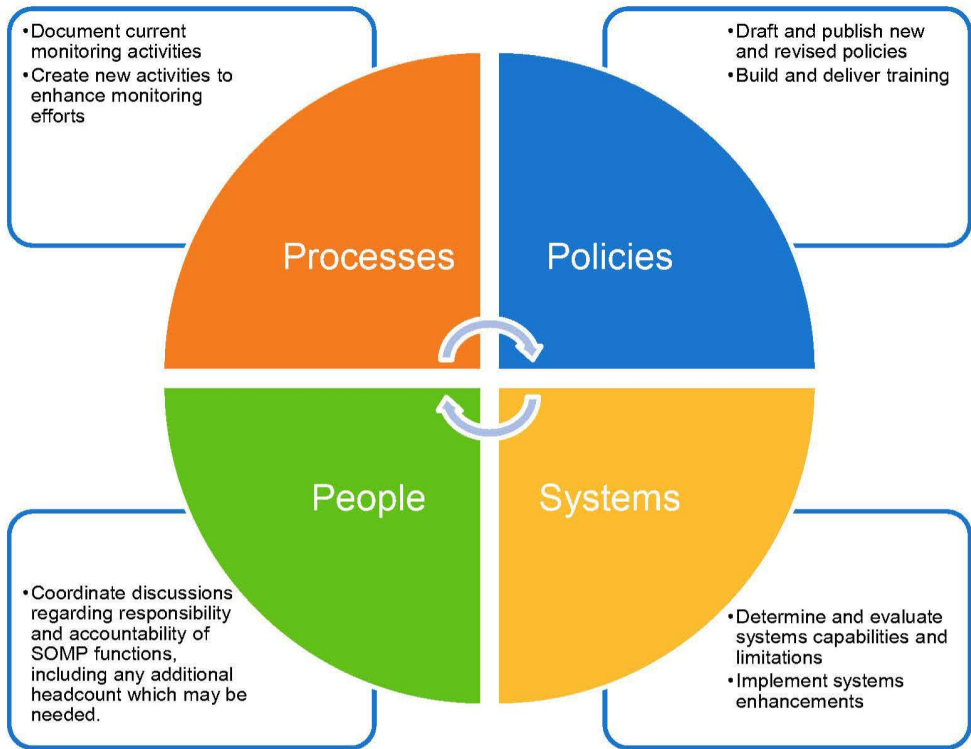
Corporate
Processes

POM
Updates &
Revisions

Prescriber
Validation

Security Cameras - CCTV	<ul style="list-style-type: none">• Establish a remediation plan regarding our CCTV standards to meet our obligations with DEA MOA• Owner – Teresa Mahavier
Refusal to Fill	<ul style="list-style-type: none">• Establish a process for the analysis of refusal to fill data and reporting problematic prescribers or patients internally• Owner – Brad Nelson
Suspicious Order Monitoring	<ul style="list-style-type: none">• Design and operate a system to detect suspicious orders and report to DEA when discovered.• Establish additional maximum order limits of highly abused drugs• Owner – Kristy Spruell
Corporate Processes	<ul style="list-style-type: none">• Create an advisory panel to facilitate the evaluation, implementation and accountability for risk assessment recommendations• Owner – Tim Koch
POM Updates & Revisions	<ul style="list-style-type: none">• Complete suggested updates to POMs to ensure consistency in execution• Owner – Tim Koch
Prescriber Validation	<ul style="list-style-type: none">• Enhance or replace our current vendor prescriber data source to ensure accuracy & completeness of data• Owner – Darren Townzen

Health & Wellness Logistics
Suspicious Order Monitoring Program (SOMP)



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Program Enhancement - Stage 1

Complete

Processes

Document current Suspicious Order Monitoring Program

Current program has been documented and documentation was used to draft and revise policies.

Improve understanding and consistency in execution of current processes

Multiple discussions with operators and support functions have improved awareness of regulatory expectations. Documentation of current program has enabled policy creation and updated. New and revised policies will be formally presented to operators in training on November 25.

Build a process for documentation of order shipment decisions

Order shipment decisions will be made, reported and tracked as detailed in new policy.

Build a process for reporting and resolution of Orders of Interest

Orders of Interest will be identified, reported and resolved as detailed in new policy.

Build a process for reporting Suspicious Orders

Suspicious Orders will be reported as detailed in new policy.

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Health & Wellness Logistics

Suspicious Order Monitoring Program (SOMP)

Program Enhancement - Stage 1

Complete

Policies

Update existing policies to provide clear and complete direction

Deleted 21-403 "Prescription Drug Monitoring". The contents of this policy were added to 21-402.

Renamed 21-110 for clarity. Now named "Reporting Unusual, Suspicious or Lost Product".

Updated 21-402 "Controlled Substance Monitoring" to include all Suspicious Order Monitoring activities. Policy includes sections for monitoring orders of Controlled and Non-Controlled products, for receiving McKesson threshold reports and for utilizing available reports (405-1, 405-2, Over 20). Renamed "Suspicious Order Monitoring".

Create policies needed to document new processes

Created "Suspicious Order Reporting" policy.

Build and deliver training needed to teach regulatory obligations, policy requirements and compliance expectations of the Suspicious Order Monitoring Program to those associates responsible for execution of the program

Training will be conducted during the Weekly Operations Conference Call on November 25.

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Suspicious Order Monitoring Program (SOMP)

Program Enhancement - Stage 1

Complete

Systems

Build processes to fully utilize current Reddwerks Order Alerts

Order Alerts will be reconfigured to reflect new values. These values have yet to be determined.

Create a system to document and retain information related to Order of Interest Investigations and reports of Suspicious Orders

All investigations of an Order of Interest or a potential Suspicious Order will be documented and retained according to policy.

Identify and scope options for potential long-term systems solutions to enable individualized & flexible item thresholds and order limits.

Potential long-term systems solutions include enhancements to Reddwerks and KNAPP as well as further utilization of the Walmart replenishment systems. Reddwerks and KNAPP can provide an alert when an item-specific threshold level is met or exceeded. The Walmart replenishment system can provide hard limits and prevent a store from placing an order which exceeds the allowable order size. These options are still being discussed.

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